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April 12, 2023

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VIA ECF MEMORANDUM ENDORSED

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

USDC SDNY
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Re: *United States v. Ivo Bechtiger et al.*, No. 20 Cr. 497 (GHW)

Dear Judge Woods:

This firm represents Daniel Wälchli, the defendant in the above-captioned matter.

At the change of plea proceeding held on March 30, 2023, the Court granted my application and scheduled sentencing for April 2, 2024. The Court further ordered the government to submit its Statement of the Case to the Probation Department within one week and Mr. Wälchli to be interviewed by the Probation Department by May 30, 2023.

The parties have spoken with Operations Supervisor Juvenia C. Williams of the Probation Department. Ms. Williams has informed us that, in cases where there is a substantial delay between the date of a plea and the sentencing date, absent objection from the Court, the Probation Department ordinarily would not assign a Probation Officer to prepare a Presentence Report until six months before the sentencing date. Moreover, pursuant to a standing order, the Probation Department is required to submit a Presentence Report to the Court within 83 days after an officer is assigned. While the Probation Department is willing to deviate from this schedule, it requires an order from this Court to do so.

Accordingly, the parties respectfully request that the Court issue an order directing the Probation Department to assign a Probation Officer immediately and issue the Presentence Report pursuant to the following schedule suggested by Ms. Williams: the government will submit its Statement of the Case to the Probation Department on or before May 5, 2023, and the Probation Department will conduct an in-person interview of Mr. Walchli in May 2023, it will issue the preliminary Presentence Report on December 27, 2023, and will issue the final

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Presentence Report on January 24, 2024. A proposed order is enclosed for your Honor's consideration. The parties have shared the proposed order with the Probation Department, which does not oppose its entry.

The parties are, of course, available at the Court's convenience to address any questions.

Respectfully submitted,

/s/ Jeremy H. Temkin

Jeremy H. Temkin

Counsel to Daniel Wälchli

Enclosure

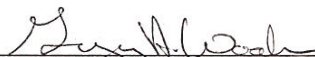
cc: AUSA Olga Zverovich (by ECF)
SAUSA Nanette Davis (by ECF)
SAUSA Christopher Magnani (by ECF)
Juvenia C. Williams (by email, with enclosure)

Application granted. The Probation Department is directed to assign a Probation Officer to this matter immediately, and to issue the presentence report on the schedule laid out on page one of this letter.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 80.

SO ORDERED.

Dated: April 12, 2023
New York, New York



GREGORY H. WOODS
United States District Judge